

**EXHIBIT 13**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**DREW J. RIBAR**, Pro Se Plaintiff  
3480 Pershing Ln  
Washoe Valley, NV 89704  
(775) 223-7899  
[Const2Audit@gmail.com](mailto:Const2Audit@gmail.com)

vs.

**WASHOE COUNTY, et al.**

Defendants.

Case No.: **3:24-cv-00526-ART-CLB**

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Counsel/Parties of Record			
<b>MAR 24 2025</b>			
Clerk US District Court District of Nevada			
By: _____		Deputy _____	

**EXHIBIT 13**

**Title:** Internal Emails Between Washoe County Library System (WCLS) Leadership Regarding  
Public Messaging and Friends of the Library's Role in Supporting Drag Queen Story Hour  
(DQSH)

**Date:** May 10, 2023

**Source:** Internal email correspondence among Washoe County Library System officials

**Bates Number Range:** EXH070-EXH071

PLEADING TITLE - 1

## DESCRIPTION

This exhibit contains internal emails among Washoe County Library System (WCLS) leadership discussing public messaging strategies related to Drag Queen Story Hour (DQSH). The emails include communications between:

- **Jeff Scott** (Library Director, WCLS)
- **Jamie Hemingway** (Interim Public Information and Development Officer, WCLS)

Key discussion points in the emails include:

1. **Drafting a response** regarding the Friends of the Library's role in funding Drag Queen Story Hour events.
2. **Deliberating** whether to present the response as an official WCLS statement or from the perspective of Jeff Scott personally.
3. **Modifying event descriptions** to frame DQSH as "one of many programs" to avoid public criticism.
4. **Coordinating public messaging** between WCLS leadership to ensure a **unified response** and **mitigate potential backlash** regarding WCLS's role in hosting DQSH events.
5. **Refining language** in external communications to **downplay the level of financial support** Friends of the Library provided for DQSH.

## **RELEVANCE TO CASE**

### **Supports First and Fourteenth Amendment Claims**

- Demonstrates **viewpoint-based discrimination** and **government control over messaging**, violating **First Amendment principles** (see **Packingham v. North Carolina**, 582 U.S. 98 (2017)).
- Shows that **WCLS officials deliberately tailored public statements** to shape the narrative, supporting **content-based regulation of speech** (see **Reed v. Town of Gilbert**, 576 U.S. 155 (2015)).

### **Refutes BOC's Motion to Dismiss**

- Strengthens the argument that **WCLS directly controlled public messaging about DQSH**, proving they were not a neutral entity but **active participants in viewpoint discrimination**.
- Provides additional **evidence of coordination between government officials and private organizations** to promote a specific agenda, undercutting BOC's claims of independent operation.

### **Relevant to Monell Liability**

- Establishes that **Washoe County Library officials, including Jeff Scott**, were actively involved in **shaping the public perception of DQSH events**, making **Washoe County liable under Monell v. Dep't of Soc. Servs.**, 436 U.S. 658 (1978).

- Demonstrates WCLS's deliberate policy of controlling speech and event messaging, violating government neutrality requirements under the First Amendment.

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## CERTIFICATE OF AUTHENTICITY

I, **Drew J. Ribar**, certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the attached documents are **true and accurate copies** of internal emails obtained from Washoe County Library System officials through public records requests and other legal means.

Dated: **March 17, 2025**

**Signed:**

/s/ **Drew J. Ribar**

Drew J. Ribar, Pro Se

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

**From:** Scott, Jeff <jscott@washoecounty.gov>  
**Sent:** 10 May 2023 18:29  
**To:** Hemingway, Jamie  
**Subject:** Re: Friends Response draft  
**Attachments:**

I think general is fine. It's technically coming from the Friends.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Hemingway, Jamie <jhemingway@washoecounty.gov>  
**Sent:** Wednesday, May 10, 2023 11:27:27 AM  
**To:** Scott, Jeff <jscott@washoecounty.gov>  
**Subject:** Re: Friends Response draft

Hi Jeff,

I made a few edits and added in all the current programs funded by the Friends. [\\_edited Drag Queen storytime Friends.docx](#)

Also, do you want this to be more of a general WCLS statement, or to be first person from you?

Thanks,

Jamie

EXH070

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Jamie Hemingway  
Interim Public Information and Development Officer | Washoe County Library System  
[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov) | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501

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**From:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>  
**Sent:** Wednesday, April 26, 2023 10:38 AM  
**To:** Hemingway, Jamie <[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)>  
**Subject:** Friends Response draft

Jamie,

Go ahead and take a look and make any edits you see fit. I was probably a little loose with what the Friends support so more detail would help demonstrate this is one of many programs.

Thanks,

Jeff

</A> Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501  
</A> </A> </A> </A>

EXH071